Attachment F

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DECLARATION OF RYAN SCHWERTNER

1. My name is Ryan Schwertner. My business address is 931 14th Street, Denver, CO 80202. I am employed as a Director of Business Marketing at CenturyLink. In that capacity, I have segment marketing and strategic pricing oversight for the RMG Business SMB and Mid-Large Business customer segments. I have been employed by CenturyLink and its predecessor companies for 9 years, holding positions in various pricing, finance and operations roles.
2. The purpose of my declaration is to discuss the ways in which CLECs are using copper loops purchased as unbundled network elements (UNEs) to provide Ethernet and other enterprise broadband services. Through use of "pair bonding," CLECs can provide broadband speeds and performance that are comparable to those of CenturyLink's enterprise broadband services – at a fraction of the cost of deploying fiber. Integra Telecom and other CLECs are using this strategy with great success to win small, medium and large business customers in CenturyLink's service territory.
3. Over the past 12 to 18 months, CLECs have successfully launched and marketed "Ethernet-Over-Copper" services in numerous areas served by CenturyLink. These areas include large metropolitan statistical areas (MSAs), such as Las Vegas, Phoenix and Seattle, but also "Tier 2" and "Tier 3" cities, such as Boise, ID, Fargo, ND, Medford, OR and Billings, MT (just to name a few examples).
4. Integra Telecom is one of the most successful providers of these services. Integra uses Ethernet-Over-Copper technology to provide a package of voice, data and Internet services with up to 30 Mbps of symmetrical upstream and downstream bandwidth.

Integra markets this Ethernet service primarily to small and medium businesses as a cost-effective, scalable alternative to the enterprise broadband services provided by ILECs and cable companies. Integra currently delivers Ethernet-Over-Copper service to more than 120 central offices throughout its eleven-state footprint in the western U.S.

5. Integra and other CLECs typically provide such services by bonding up to eight copper UNE loops purchased from an ILEC such as CenturyLink. Through use of DSL-based technologies, the CLEC is able to provide broadband speeds and performance over the ILEC's existing copper infrastructure that rival those of fiber-based broadband services, without the construction costs required for new fiber optic installation. The CLEC's cost structure is further reduced by the fact that it can purchase the copper loops at TELRIC rates.

6. Integra has used this cost advantage to offer very competitive rates and gain large numbers of business customers in areas served by CenturyLink. On average in Phoenix, Minneapolis, Seattle, Denver and Portland, for example, Integra's revenues for data services provided to "mid-market" customers exceed those of any other provider, including CenturyLink. But these services are not limited to the largest metropolitan areas served by CenturyLink. Integra has also deployed Ethernet-Over-Copper services to smaller metropolitan areas including Idaho Falls, Fargo, ND and Salem, OR.

7. Other CLEC providers of Ethernet-Over-Copper services include EarthLink Business, CBeyond, MegaPath, Paetec and XO.

/s/ Ryan Schwertner
Ryan Schwertner

February 23, 2012